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September 1, 2015

BY EMAIL AND ECF

Honorable Thomas P. Griesa
United States District Court for
the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *NML Capital, Ltd. v. Republic of Argentina*, No. 14 Civ. 8601;
NML Capital, Ltd. v. Republic of Argentina, No. 14 Civ. 8988.

Dear Judge Griesa:

We write in connection with the motion for specific performance (concerning the *pari passu* clause) filed by NML Capital, Ltd., dated August 14, 2015, and since August 14 joined by numerous plaintiffs in various actions. With the consent of plaintiffs, we inform the Court that the parties have agreed to the following briefing schedule:

- The Republic shall have until September 25, 2015, to serve responsive papers.
- Plaintiffs shall have until October 9, 2015, to serve reply papers.

It is our understanding, based on discussions with counsel for NML, that the plaintiffs have agreed that the foregoing schedule shall apply to all plaintiffs who file "me too" motions¹ on or before September 14, 2015, as well those already filed in the following actions (the "Motions"):

- *FFI Fund, Ltd. and FYI Ltd. v. Republic of Argentina*, No. 14 Civ. 8630;

¹ The parties agree that a "me too" motion is any motion that joins NML's Memorandum of Law and that makes no additional arguments. To the extent that a plaintiff files a motion for specific performance that includes arguments not otherwise found in NML's Memorandum of Law, the Republic will coordinate with that plaintiff on an appropriate briefing schedule.

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- *EM Ltd. v. Republic of Argentina*, No. 14 Civ. 8303;
- *Perez, et al. v. Republic of Argentina*, No. 14 Civ. 8242;
- *Aurelius Capital Partners, LP and Aurelius Capital Master, Ltd., v. Republic of Argentina*, No. 14 Civ. 8946;
- *Blue Angel Capital I LLC v. Republic of Argentina*, No. 14 Civ. 8947;
- *Capital Ventures International v. Republic of Argentina*, No. 14 Civ. 7258;
- *Adami, et al. v. Republic of Argentina*, No. 14 Civ. 7739;
- *Capital Markets Financial Services Inc., et al. v. Republic of Argentina*, No. 15 Civ. 0710;
- *Foglia, et al. v. Republic of Argentina*, No. 14 Civ. 8243;
- *Pons, et al., v. Republic of Argentina*, No. 13 Civ. 8887;
- *Guibelalde, et al. v. Republic of Argentina*, No. 11 Civ. 4908;
- *Dorra, et al. v. Republic of Argentina*, No. 14 Civ. 10141;
- *Beloqui, et al. v. Republic of Argentina*, No. 14 Civ. 5963;
- *Tortus Capital Master Fund, LP v. Republic of Argentina*, Nos. 14 Civ. 1109, 14 Civ. 3127;
- *Trinity Investments Limited v. Republic of Argentina*, Nos. 14 Civ. 10016, 15 Civ. 1588, 15 Civ. 2611, 15 Civ. 5886;
- *Montreux Partners, L.P. v. Republic of Argentina*, No. 14 Civ. 7171;
- *Los Angeles Capital v. Republic of Argentina*, No. 14 Civ. 7169;
- *Cordoba Capital v. Republic of Argentina*, No. 14 Civ. 7164;
- *Wilton Capital, Ltd. v. Republic of Argentina*, No. 14 Civ. 7166;
- *MCHA Holdings, LLC v. Republic of Argentina*, Nos. 14 Civ. 7637, 14 Civ. 10064, 15 Civ. 2577, 15 Civ. 5190;
- *Claridae, et al. v. Republic of Argentina*, No. 14 Civ. 10201;
- *Angulo, et al. v. Republic of Argentina*, No. 15 Civ. 1470;
- *Lambertini, et al. v. Republic of Argentina*, No. 15 Civ. 1471;

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- *Lightwater Corporation Limited v. Republic of Argentina*, No. 14 Civ. 4092;
- *Andrarex, Ltd. v. Republic of Argentina*, No. 14 Civ. 9093; and
- *Attestor Master Value Fund LP v. Republic of Argentina*, No. 14 Civ. 5849.

Pursuant to Rule 1.F of the Court's individual practices, the parties represent that this is the first request for an extension of the briefing schedule for the Motions.

We respectfully request that the Court so-order the proposed schedule.

Respectfully submitted,


Carmine D. Boccuzzi Jr.

cc: Counsel of Record (by ECF)

SO ORDERED:

U.S.D.J.